

RECEIVED
DOCKET FILE COPY ORIGINAL
JUL 15 1996

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)	
)	
Amendment of the Commission's Rules to)	ET Docket No. 96-102
Provide for Unlicensed NII/SUPERNet)	RM-8648
Operations in the 5 GHz Range)	RM-8653

COMMENTS OF THE WIRELESS LAN ALLIANCE

The WLANA, Inc., a wireless LAN alliance ("WLANA"), hereby supports for the Commission's recent proposal to allocate 350 MHz of spectrum for use by unlicensed wireless data communications devices.

BACKGROUND AND STATEMENT OF INTEREST

WLANA was formed in January of 1996 in order to promote increased awareness and knowledge of wireless local area networks ("LANs") among potential customers, independent software vendors, and systems integrators, as well as to respond to the need for more vendor-independent information about the burgeoning wireless LAN market. Its members include the following major worldwide suppliers of wireless LAN products and technology, each of whom has recognized the enormous potential of wireless LANs and who, together, are responsible for more than 95 percent of existing wireless LAN industry revenues:

- 3Com Corporation
- Aironet Wireless Communications Inc.
- Digital Equipment Corporation
- IBM Corporation
- Lucent Technologies (formerly AT&T)
- Norand Corporation
- Proxim Inc.
- Symbol Technologies
- Windata
- Xircom
- AMD
- Harris Semiconductor
- Raytheon Corporation
- Intermec Corporation

No. of Copies rec'd
List A B C D E

015

COMMENTS

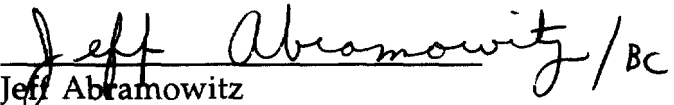
The Commission's proposal to provide a substantial additional spectrum allocation for wireless LANs recognizes and responds to the rapidly increasing demand for wireless LAN technologies. According to most industry experts, the wireless LAN market nearly tripled in size between 1993 and 1995, providing between \$150 and \$230 million in annual revenues by the end of this period. Industry estimates predict that the market will continue to grow at a rapid rate, exceeding the \$1 billion mark by the year 2000.

The growth of wireless local area networking options will bring an array of benefits to users in both the public and private sectors. Wireless local area networking is an enabling technology that provides users with a flexible networking option. This flexibility can result in productivity, service, and convenience benefits that are not possible with wired LANs, and can provide ease of installation and cost benefits over wired LANs. Particularly in industries in which mobility is critical — such as warehousing, retail, and healthcare — the ability to use wireless LANs makes it possible to provide users with convenient, real-time access to an ever-increasing array of information.

The proposed NII/SUPERNet allocation will further expand the ability of wireless LAN products to meet the needs of businesses, schools, communities, consumers, and others. By providing additional frequencies for unlicensed wireless operation, the Commission will enable manufacturers to create additional options for users. In particular, the proposed 350 MHz allocation will make it possible to create wireless connections supporting video and other high bandwidth applications.

For these reasons, WLANA strongly supports the Commission's proposal to allocate additional spectrum in the 5 GHz range for use by unlicensed wireless data communications devices.

Respectfully submitted,


Jeff Abramowitz
President
WLANA, Inc.
409 Sherman Avenue
Palo Alto, California 94123
(415) 328-5555
info@wlana.com

Counsel:

Henrietta Wright
GOLDBERG, GODLES, WIENER & WRIGHT
1229 Nineteenth Street, NW
Washington, D.C. 20036
(202) 429-4900
hwright@G2W2.com